1   UNITED STATES DISTRICT COURT

2   SOUTHERN DISTRICT OF NEW YORK

3   --x

4   MEDIDATA SOLUTIONS, INC.

5   Plaintiff,

6
        -against-   Civil Action No.:
7   1:15-cv-000907-ALC

8
     FEDERAL INSURANCE COMPANY,
9   Defendant.

10   --x

11

12

13

14   VIDEOTAPED DEPOSITION of a Non-Party

15   Witness, ██████, taken by the Defendant, pursuant

16   to Notice, held at the offices of Gordon & Rees, LLP,

17   One Battery Park Plaza, New York, New York, 10004, on

18   June 24, 2015, at 9:30 a.m. before a Notary Public of

19   the State of New York.

20

21

22

23

24

25

1   ████████

2   education on a year-to-year basis?

3   A.   I have not since I became inactive.

4   Q.   Do you recall when you became inactive?

5   A.   I do not. It was early 2000 sometime,

6   mid-2000, somewhere in there.

7   Q.   Who's your current employer?

8   A.   ██████████████████████

9   Q.   How long have you been employed there?

10   A.   Since January of this year.

11   Q.   What's your position with ███████?

12   A.   I'm the ████.

13   Q.   As the ████ of ████████ is it your

14   responsibility to oversee the accounting

15   department?

16   A.   Yes.

17   Q.   As the ████ of ████████ is it your

18   responsibility to provide training to the

19   people within your department?

20   A.   Yes.

21   Q.   Do you provide that training internally

22   or do you send your people to outside training?

23   A.   Internally.

24   Q.   Have you as the ████ of ████████ provided

25   your employees with any training on Internet

1   ███████

2   scams or e-mail scams?

3   A.   No.

4   Q.   Have you at any time ever gone to any

5   training or received any training on Internet

6   scams?

7   A.   I can't recall for formal training, but

8   read articles and as such.

9   Q.   Do you recall when you read articles?

10   A.   Through the years.

11   Q.   Do you recall any of the articles you

12   read?

13   A.   No.

14   Q.   Are you familiar with the concept of

15   social engineering?

16   A.   No.

17   Q.   Where did you work prior to ████████?

18   A.   Company called ████████,

19   ██████████████.

20   Q.   When did you work there?

21   A.   Until I went to Medidata, so it's '13,

22   2010 to 2013.

23   Q.   Did Medidata become ████████?

24   A.   No.

25   Q.   At what point were you at Medidata?

 1   ███████████

 2   A.   2013 through 2014.

 3   Q.   What was your position at Medidata?

 4   A.   ██████████████████████████████████

 5   ████████.

 6   Q.   What were your responsibilities in that

 7   position?

 8   A.   Analytics and budgeting.

 9   Q.   When you say analytics, what are you

10   referring to?

11   A.   Analyzing numbers. Providing support

12   for the management team.

13   Q.   To whom did you report as the

14   ██████████████████████████████████████

15   ██████████?

16   A.   Chief Financial Officer.

17   Q.   And who was that?

18   A.   Cory Douglas.

19   Q.   As a ██████████████ of Medidata were you

20   an authorized signatory on any of Metidata's

21   bank accounts?

22   A.   Could you repeat that question?

23   Q.   Sure. When you were a ██████████████ at

24   Medidata were you an authorized signatory on

25   any of Medidata's bank accounts?

1   ████████

2   A.   I could approve wires.

3   Q.   Could you sign checks?

4   A.   I can't recall. I have not signed any.

5   Q.   Do you remember what bank Medidata used

6   when you were working there?

7   A.   Chase.

8   Q.   When you first came to Medidata were you

9   provided any training on Medidata's policies

10   and procedures in terms of approval of wire

11   transfers?

12   A.   From mechanical steps, yes.

13   Q.   Were you provided any training as to who

14   within the company had authority to approve

15   expenditures?

16   A.   Yes.

17   Q.   And how did you receive that training?

18   A.   Informally.

19   Q.   And who did you receive the informal

20   training from?

21   A.   I believe it was the assistant

22   controller.

23   Q.   And who was that?

24   A.   God, his last name escapes me. Steven.

25   I can't recall the last name.

1

2   Q.   Do you recall what you were told about

3   who within the company had authority to approve

4   expenditures?

5   A.   Within the finance group, yes.

6   Q.   What do you mean, within the finance

7   group?

8   A.   Within the finance group who could

9   actually approve the wires.

10   Q.   Who within the finance group could

11   approve wires?

12   A.   I believe it was the CFO, controller,

13   assistant controller and Rob Shaw, who was the

14   VP of Finance.

15   Q.   When you first joined Medidata were you

16   given copies of the accounting policies and

17   procedures?

18   A.   No.

19   Q.   How often on regular basis in the 2014

20   time frame would you execute or approve wire

21   transfers?

22   A.   I would say, including this one, three

23   would be a lot.

24   Q.   Three in --

25   A.   Yes.

1   ██████████

2   God, I'm trying to think now. I believe it

3   said e-mail. I believe it was an e-mail, that

4   asked us to be ready potentially over the

5   weekend for a wire and then was later told that

6   it wasn't necessary, it was potentially a spam.

7   So I looked at it and discounted it.

8   Q.   So as I understand it, prior to the

9   September 16 wire transfer there was another

10   e-mail received by Medidata relating to a wire

11   transfer?

12   MR. ZIFFER: Objection.

13   A.   I believe it was CFO asking us to be

14   ready because it was going to be the weekend

15   potentially and a wire was necessary. And then

16   realized or sent another one saying never mind.

17   That was the extent of it.

18   Q.   Is it your understanding that the first

19   incident in earlier -- strike that.

20   Was it your understanding that this

21   first incident did not result in a wire

22   transfer actually going out?

23   A.   Which first?

24   Q.   The first spam e-mail you're talking

25   about in your testimony, did it result in money

1   ███████

2   leaving Medidata?

3   MR. ZIFFER: Objection.

4   A.   No.

5   Q.   And that's because the -- somebody

6   determined that the e-mail was spam before the

7   wire transfer was actually sent out?

8   MR. ZIFFER: Objection.

9   A.   Didn't really pay that much attention to

10   it because I wasn't involved or asked to

11   approve a wire.

12   Q.   Was there any, as far as you know, was

13   there any way within the Medidata system for an

14   e-mail to automatically prompt the approval of

15   a wire transfer?

16   MR. ZIFFER: Objection.

17   A.   I don't know.

18   Q.   Well, other than the process you walked

19   us through earlier, signing in through a unique

20   key into a Chase system, were you aware of any

21   other way to approve a wire transfer from

22   Medidata's account when you worked at Medidata?

23   A.   The process I described to you earlier

24   is the only way I knew.

25   Q.   When you first started at Medidata were

1   ████████

2   you assigned an e-mail account?

3   A.   Yes.

4   Q.   How did you on a day-to-day basis access

5   your e-mail account when you worked at

6   Medidata?

7   A.   I would turn my computer on. I would

8   then after I put the password and everything

9   in, then would go to Gmail and log in from

10   that.

11   Q.   When you say Gmail, you mean you'd have

12   to go on to the Internet and log in to Google's

13   e-mail systems?

14   A.   Yes.

15   Q.   Is that the same Gmail that is publicly

16   accessible, by publicly accessible --

17   MR. ZIFFER: Objection.

18   A.   I don't know.

19   Q.   Do you have a personal Gmail account?

20   A.   Yes.

21   Q.   If you were to log into your personal

22   Gmail account would you do it the same way as

23   you logged in to your Medidata account, just a

24   different account name and password?

25   A.   Yes. From the user's perspective, yes.

```
 1                         ████████
 2              the record at 10:21 a.m.  You may
 3              proceed.
 4    BY MR. SCHMOOKLER:
 5    Q.      Do you recall the wire transfer that
 6    went out on September 16, 2014?
 7    A.      Is that the transaction we're --
 8    Q.      That's the transaction we're here about.
 9    A.      And the question?
10    Q.      Do you recall it?  Do you recall that
11    day?
12    A.      No, I don't, but yes, I do.
13    Q.      And at that point you were one of the
14    people who could approve wire transfers,
15    correct?
16    A.      Yes.
17    Q.      Do you recall how you first learned
18    about the wire transfer on September 16?
19    A.      It came through an e-mail.
20    Q.      Were there any verbal discussions prior
21    to your receipt of an e-mail?
22    A.      If you mean for that particular
23    transaction, saying that it's coming?
24    Q.      Yes.
25    A.      No.
```

```
 1                              ███████████
 2     Q.      Did ██████████ at all mention it to you
 3     prior to receiving the e-mail?
 4     A.      I can't recall the sequence, but I do
 5     remember ████████, ███████, asking if I had
 6     chance to approve the wire.
 7     Q.      Do you recall -- were you at any time
 8     provided any explanation as to why money was
 9     being wired out?
10     A.      From ███████ or from --
11     Q.      Anyone.  Were you provided any
12     explanation by anyone as to why money was being
13     wired?
14     A.      If I recall correctly, ███████, when she
15     asked if I approved the wire, did let me know
16     it was from █████.
17     Q.      Earlier you spoke about when you
18     approved other wire transfers you received
19     paperwork, supporting documentation that you
20     would go through.
21             Were you provided any supporting
22     documentation on September 16 in support of
23     this wire?
24     A.      No.
25     Q.      Did you at the time of the wire have any
```

1   ██████

2   idea why 4 plus million dollars was being wire

3   transferred?

4   A.   I assumed something.

5   Q.   What did you assume?

6   A.   That it was for an acquisition that was

7   in play.

8   Q.   When you say acquisition, what are you

9   talking about?

10   A.   We were going through an M and A

11   transaction at the time about the same size.

12   Q.   When you say M and A transaction what

13   are you referring to?

14   A.   Meaning we were in a process of

15   acquiring an organization.

16   Q.   So Medidata was purchasing a company?

17   A.   Yes.

18   Q.   Do you know where that purchase was

19   occurring, what area of the world, country?

20   A.   I can't recall the specifics at the

21   moment.

22   Q.   So at the time you approved the wire

23   transfer in September, on September 16, it was

24   your assumption that the wire transfer was to

25   fund an existing purchase of a company?

1   ███████

2   A.   Yes.

3   MR. ZIFFER: Objection.

4   Q.   And at the time -- strike that.

5   After you received this e-mail, and

6   we'll get to the e-mail in a moment. After you

7   received this e-mail, what was the next step

8   you took in approving the wire transfer?

9   MR. ZIFFER: Can I get the

10   question back? Sorry.

11   (The record was read as requested.)

12   Q.   Let me rephrase it. After you received

13   the e-mail allegedly from ███████████, what

14   was the next step you took to approve the wire

15   transfer?

16   A.   Once it became time for me to approve I

17   followed the same procedure I outlined earlier,

18   which is to log in to the system, determining

19   which wire pertained to that specific

20   transaction, and then approving it.

21   Q.   So after you received the e-mail

22   allegedly from ███████████ you had to get the

23   fob and obtain a password, correct?

24   A.   Yes.

25   Q.   After you received the e-mail from

1   ████████

2   ████████████ and you get your fob, you had to

3   log it in to the Chase system, correct?

4   A.   Yes.

5   Q.   And then the third step after you

6   received this e-mail allegedly from

7   ████████████ is to actually approve the wire

8   transfer, correct?

9   A.   Yes.

10   Q.   And you knew at the time -- strike that.

11   At the time you logged in to the Chase

12   system after receiving this alleged e-mail from

13   ████████████, you did so in order to approve

14   the wire transfer, correct?

15   A.   Yes.

16   Q.   And you understood at the time you

17   logged into the system and you approved the

18   transfer exactly what were you were doing,

19   which was to approve a wire transfer so that

20   the money could go out, correct?

21   A.   Yes.

22   Q.   And you approved that transfer because

23   it was with the understanding -- strike that.

24   And you approved that transfer on the

25   belief that it was going to fund an existing

1   ████████

2   purchase the company was going through?

3   A.   Yes.

4   (E-mail dated September 16, 2014, was

5   marked as Defendant's Exhibit 3 for

6   identification, as of this date.)

7   Q.   I'm going to show you what I've marked

8   as Exhibit 3. And I apologize for the quality

9   of the copy, but this is the best I could do

10   with what I have.

11   A.   Okay.

12   Q.   Do you recall receiving an e-mail of

13   this nature on September 16?

14   A.   Yes.

15   Q.   And do you see how there's no signature

16   on this e-mail --

17   MR. ZIFFER: Objection.

18   Q.   -- at the bottom? Just says, best

19   regards, and then there are dots?

20   A.   Uh-huh.

21   Q.   Do you see that, sir? I need a yes,

22   A.   Yes, yes, sorry about that. Yes.

23   Q.   Do you recall when you received this

24   e-mail allegedly from ████████████ whether

25   there was in fact a name typed at the end?

1   ███████

2   A.   I don't recall, but if you push that

3   button I believe that does provide the

4   signature.

5   Q.   What do you --

6   A.   Those three dots.

7   Q.   A button?

8   A.   Those three dots, yes.

9   Q.   Do you know how that signature appears,

10   is it auto-populated or something?

11   A.   I don't know.

12   Q.   Do you know in the e-mail system that

13   you used if you had to push the button in order

14   for the name to populate?

15   A.   Could you ask the question again?

16   Q.   Sure. The three dots apparently

17   represent a button if you were in the e-mail

18   system; is that correct?

19   A.   I believe so, yes.

20   Q.   Do you have to click on that button in

21   the e-mail system to get the name to appear?

22   A.   At times, yes.

23   Q.   So there are certain times a name will

24   automatically appear and certain times you have

25   to click the button?

1   ████████

2   A.   I believe so, yes.

3   Q.   Do you know why there are certain times

4   when you have to click a button for the name to

5   appear?

6   A.   No.

7   Q.   Do you know if in the instances where

8   you have to click the button for the name to

9   appear, that name is somehow provided by Gmail?

10   A.   Can you ask the question again?

11   Q.   Sure. Do you know if in the instances

12   where you have to push the button for the name

13   to appear, if that information is populated

14   automatically by Gmail?

15   A.   I don't know.

16   Q.   So do you recall -- I don't know if I

17   asked this. I apologize if I have. Do you

18   recall if on the day, on September 16th when

19   this e-mail appeared, if you actually clicked

20   on that button to get the name to appear?

21   MR. ZIFFER: Objection.

22   A.   I don't recall.

23   Q.   Do you recall if when you received this

24   e-mail on September 16th if a name appeared or

25   if there was the button?

1   ███████

2   A.   I don't recall.

3   (E-mail string of September 16, 2014,

4   was marked as Defendant's Exhibit 4 for

5   identification, as of this date.)

6   Q.   Let me show you what I've marked as

7   Exhibit 4. This is a set of e-mails. As in

8   any e-mail string, the newest one is at the top

9   and the oldest one is at the bottom.

10   Do you see that, sir?

11   A.   Yes.

12   Q.   So I think it would be easier since

13   they're all September 16th to use the time

14   stamp on the e-mail to reference them.

15   A.   Okay.

16   Q.   Do you see the e-mail with the time

17   stamp 3:32, which is on first page of Exhibit

18   4, it's at the top of the page?

19   A.   Yes.

20   Q.   And do you see how the e-mail at the top

21   of the page on Exhibit 4, the text is similar

22   to the text on Exhibit 3?

23   A.   Yes.

24   Q.   And do you see how on Exhibit 4 a name

25   appears under, best regards?

1   ████████

2   Q.   Did somebody call that to your attention

3   or did you detect that?

4   A.   No, I called it to someone's attention.

5   Q.   And why did you call that to someone's

6   attention?

7   A.   Because, probably getting ahead, but

8   several days after this initial transaction

9   when money got transferred, we received another

10   e-mail from ████ asking us to wire the amount,

11   another amount. It was a large sum. I got

12   suspicious and wanted to really confirm, so

13   when I hit reply, that's when I realized that

14   another e-mail address came on.

15   Q.   And that's sort of what you see at the

16   3:34 p.m. e-mail on Exhibit 4, correct, where

17   it says to ████████ secureop@dr.com?

18   A.   Yes. If you're talking about the,

19   specifically speaking of the address, the way

20   it came up, I believe that's the case, yes.

21   Q.   And so the address in the second e-mail

22   on Exhibit 4 is the address that led you to

23   conclude that the second attempt was

24   illegitimate?

25   A.   Well, I actually thought that was the

1   ▮▮▮▮▮▮▮

2   first attempt, but yes.

3   Q.   Well, I'm just --

4   A.   Yes.

5   Q.   -- separating the attempts for purposes

6   of today.

7   A.   Yes, yes.

8   Q.   So back to my question. The e-mail at

9   3:34, the to address, meaning secureop@dr.com,

10   it's that address that led you to conclude that

11   the subsequent attempt later in September was

12   illegitimate?

13   A.   Yes.

14   Q.   And as I understand it, what made you

15   reach that conclusion is secureop@dr.com is

16   nothing related to Medidata?

17   A.   Correct.

18   Q.   And so just by looking at that address

19   you could tell immediately this is not

20   something legitimate?

21   A.   I couldn't tell if it was something that

22   was illegitimate. There was something that was

23   definitely not correct about the e-mail. So I

24   wanted to make sure that it was okay.

25   Q.   If you go back to the top of the page on

1   ███████

2   Exhibit 4, the 3:32 p.m. e-mail.

3   A.   Yes.

4   Q.   It says in the first sentence, "I'm

5   currently undergoing a financial operation in

6   which I need you to process and approve a

7   payment on my behalf."

8   Do you see that?

9   A.   Yes.

10   Q.   Is that what led you to believe that

11   this payment, this wire transfer, was to fund

12   this pending acquisition or pending purchase by

13   Medidata?

14   A.   Yes.

15   Q.   When you received the e-mail, this

16   3:32 p.m. e-mail, the e-mail itself didn't

17   automatically prompt money to be

18   wire-transferred. You then had to go through a

19   number of other steps to actually transfer the

20   money, correct?

21   A.   Yes.

22   MR. ZIFFER: Objection.

23   Q.   And, in fact, the subsequent attempt

24   that didn't go through, you received an

25   analogous e-mail asking for another wire

1   ███████

2   transfer, correct?

3   A.   Yes.

4   Q.   And that attempt failed even though you

5   received the e-mail, correct?

6   A.   Yes.

7   Q.   And that attempt, as I understand it,

8   failed because you recognized there was

9   something amiss and just didn't approve the

10   wire transfer?

11   A.   I knew something was amiss, given that

12   its second request wanted to validate, hence

13   wanting to have positive confirmation with

14   ████.

15   Q.   And the second attempt, even though you

16   received an e-mail allegedly from ███████████,

17   failed because no one ever actually approved a

18   wire transfer so no money could go out,

19   correct?

20   A.   Correct.

21   Q.   This purchase that you referenced, was

22   this purchase known within the accounting

23   department?

24   A.   Within certain individuals, yes.

25   Q.   I'm talking about the legitimate

1   ███████

2   received the e-mail from ████████████ and the

3   time when you actually approved the wire

4   transfer?

5   A.   Yes.

6   Q.   Were you the first approver of the

7   transfer or the second?

8   A.   Second.

9   Q.   And so do you know why it took more than

10   an hour from when the e-mail was received to

11   when you approved the wire?

12   A.   Yes.

13   Q.   Why was that?

14   A.   I was in meetings.

15   Q.   Was the wire transfer request set up at

16   the time you received the e-mail from

17   ████████████?

18   A.   Don't know.

19   Q.   Do you see how on the bottom of the

20   first page of Exhibit 4, 4:8 e-mail it says,

21   "The wire has been set up in Chase and is

22   awaiting your approval/release?"

23   A.   Yes.

24   Q.   Do you know if ████████ or anyone at

25   Medidata even had wire transfer instructions at

1   ████████

2   the time you received the first e-mail from the

3   alleged ████████████?

4   A.   Don't know.

5   Q.   Did █████████, between the time you

6   received the alleged e-mail from ███████████,

7   and the time you approved the wire transfer,

8   provide any other information to you verbally

9   about this wire transfer?

10   A.   Yes.

11   Q.   What did she tell you?

12   A.   I had asked her if she had specifically

13   spoke to him and the response she gave me was,

14   yes, she had.

15   Q.   Spoke to, when you said him, I just want

16   to know who you're referring to?

17   A.   I was referring to ████. Meaning that

18   was my way of assuring and getting another

19   validation that this wire, even though this

20   paper was the only document I had, was a valid

21   wire.

22   Q.   When you spoke to ████████ did you ask

23   her specifically if she spoke to ██████████

24   or did you use the word him?

25   A.   Him.

1   ███████

2   Q.   And ████████ responded that she spoke

3   to him?

4   A.   Yes.

5   Q.   Did she actually say she spoke to

6   ██████████?

7   A.   No. She stated that she did speak to

8   him and had been calling.

9   Q.   Did she share with you any other e-mails

10   that she had received regarding this wire

11   transfer?

12   A.   No.

13   Q.   Do you know if ████████████ was in the

14   office on September 16th?

15   A.   I can't recall, but a lot of the

16   individuals were out.

17   Q.   As a matter of course in September of

18   2014, did you sign in to e-mail every morning

19   and just keep it open throughout the course of

20   the day?

21   A.   Yes.

22   Q.   And so the morning of the 16th when you

23   arrived -- strike that.

24   Whenever you arrived at work on the 16th

25   you at first had to sign in to Gmail in order

1   ██████████

2   Q.   So at the time that you logged in you

3   were able to see who the beneficiary of the

4   wire was, correct?

5   A.   I would have to have seen it, yes.

6   Q.   And you would have also been able to see

7   the bank at the time you logged in to the

8   system and approved the wire, correct?

9   A.   Yes.

10   Q.   And you would have been able at the time

11   you logged into the system and approved the

12   wire you would have been able to see the amount

13   of the wire, correct?

14   A.   Yes.

15   Q.   And in your -- based on your knowledge

16   of Medidata's existing purchase, the

17   information in the wire transfer seemed

18   consistent with your understanding of that

19   transaction?

20   A.   I assumed, yes.

21   Q.   Well, based upon what you knew of the

22   transaction at the time you logged in it was

23   your understanding that the information in the

24   wire transfer was consistent with this existing

25   purchase?

1 ▮▮▮▮▮

2 A.   Amount, yes. As far as beneficiaries

3 and parties, I had no idea who it was.

4 Q.   But the only reason you approved this

5 wire is because it was your impression that

6 this was funding an existing purchase Medidata

7 was actually going through?

8   MR. ZIFFER: Objection.

9 A.   Yes.

10   (Screen shot was marked as Defendant's

11 Exhibit 6 for identification, as of this date.)

12   MR. SCHMOOKLER: Let me show you

13   what I've marked as Exhibit 6. This

14   is -- well, I wanted this to only be a

15   one-page document, but that's okay.

16   MR. ZIFFER: Do you want to rip

17   off the back?

18   MR. SCHMOOKLER: Yeah.

19   MR. ZIFFER: You want it back?

20   MR. SCHMOOKLER: No. Thank you.

21   It's the same thing we just saw. It's

22   just a duplicate of it.

23 Q.   So Exhibit 6 is another screen shot,

24 correct? Let me ask you this. Have you ever

25 been seen Exhibit 6 before?

1   ██████████

2   A.   No.

3   Q.   Let me just ask you a couple things that

4   I think you might be able to glean from the

5   document. Do you see your name under where it

6   says released?

7   A.   Yes.

8   Q.   And then it has ████████████████?

9   A.   Yes.

10   Q.   Is that some sort of user ID assigned to

11   you by Medidata?

12   A.   Yes.

13   Q.   When you logged into the Chase system

14   did you have to provide some sort of Medidata

15   user ID?

16   A.   This was the user ID that had been set

17   up when I was provided with access to the

18   system.

19   Q.   Access to the Chase system?

20   A.   Yes, Chase system.

21   Q.   So when you used the Chase system to do

22   a wire transfer, in addition to using the

23   unique key or password generated by this fob,

24   you also had to provide a user ID?

25   A.   Yes.

1 ▓▓▓▓▓▓▓

2 Q.   Was your user ID for the Chase system

3 something that was published within Medidata at

4 all?

5 A.   I don't believe so, no.

6 Q.   So when you log into the Chase system,

7 you log into the Internet and you call up the

8 Chase wire transfer system, did it ask you to

9 input two things first, a user ID and then

10 second the password?

11 A.   Yes.

12 Q.   And so did you -- strike that.

13   So like any sort of sign-in system you

14 needed both the user ID and the password to get

15 into the Chase system?

16 A.   Yes.

17 Q.   And then do you see where it says

18 digital signature and then it has your name and

19 then your user ID again?

20 A.   Yes.

21 Q.   When you approved, was there any sort of

22 digital signature you remember entering into

23 the Chase wire transfer system?

24 A.   No.

25 Q.   Do you recall, you said you were in a

```
 1                         ████████

 2   meeting when you first received the alleged

 3   e-mail from ███████████.   Do you remember who

 4   you were meeting with?

 5   A.       I do not.

 6   Q.       Did you mention the wire transfer to

 7   anyone in the meeting?

 8   A.       I can't recall.  Only individual --

 9   Q.       Did you speak to ██████████ about the

10   wire transfer?

11   A.       That's what I was trying to figure out.

12   Only individuals I would have spoken with would

13   have been ████, because he was on that e-mail.

14   At what time I'm not certain.  That's why I

15   stopped myself.

16   Q.       Do you remember if you spoke to

17   ██████████ before you approved the wire?

18   A.       Yes.

19   Q.       And do you recall why you spoke to

20   ██████████ before you approved the wire?

21   A.       Partly because I wasn't familiar on how

22   to navigate the system and I needed some help.

23   Q.       Did he help you navigate the system

24   or --

25   A.       Yes.
```

1   ███████

2   Q.   Had he had at that time already approved

3   the wire?

4   A.   Yes.

5   Q.   So using the time stamps here it would

6   have been right around 4:30 eastern time on the

7   16th?

8   A.   Yes.

9   Q.   Do you and ███████████ sit next to each

10 other or sit near each other at the office?

11   A.   Same floor, about 30 yards away.

12   Q.   When you spoke to him about navigating

13 the system, did you talk about the wire

14 transfer, about why it was being approved or

15 what it was about at all?

16   A.   I believe so, yes.

17   Q.   Do you remember anything that was said

18 in that regard during your conversation with

19 ███████████?

20   A.   I believe we both assumed that it had to

21 have been a transaction of some sort.

22   Q.   Why do you say that? What about your

23 conversation leads you to say that?

24   A.   Could you re --

25   Q.   Sure. When you said, we both assumed, I

1   ██████████

2   just want to know why you think ████████████

3   believed that the transfer was in connection

4   with this ongoing legitimate purchase by

5   Medidata?

6   A.   Because I believed he was also in the

7   know.

8   Q.   Did you talk about that purchase during

9   this conversation immediately before you

10   approving the wire transfer?

11   A.   I can't recall.

12   Q.   You can put that to the side.

13   (A screen shot of i-messaging was

14   marked as Defendant's Exhibit 7 for

15   identification, as of this date.)

16   Q.   I'd like to show you what I've marked as

17   Exhibit 7. This also looks like a screen shot.

18   I'm not sure if it's a screen shot text or

19   something else. Do you know what this is a

20   screen shot of?

21   A.   Phone.

22   Q.   Is this a screen shot of your phone?

23   A.   This has got to be ██████.

24   Q.   Why do you say that?

25   A.   Because, if I recall, i-messaging, your

1   ████████

2   A.   Yes, I believe so.

3   Q.   And then ██████████ texts back, just

4   approved and signed on your desk?

5   A.   Yes.

6   Q.   This all relates to the second attempt,

7   correct?

8   A.   Yes.

9   Q.   And some time after you received this

10   text is when you questioned that wire transfer?

11   A.   Yes, I believe so.

12   Q.   Do you recall if at the time of the

13   second transfer when you questioned it, did you

14   speak to someone about it?

15   A.   There was Dave. Dave, yeah, was in the

16   room as well.

17   Q.   Do you remember what you said to him

18   about it?

19   A.   He was my new manager and I just didn't

20   think it was -- I forget how the conversation

21   started, but we somehow got to talk and

22   realized that there may have been something

23   that was not right about that e-mail.

24   Q.   And then what did you do next after

25   that?

1   ████████

2   A.   That's when I started to, I think,

3   write -- try to respond to that e-mail to ████

4   about the same time, is when we realized that

5   was not his e-mail address.

6   Q.   And did you just stop the transaction

7   there?

8   MR. ZIFFER: Objection.

9   MR. SCHMOOKLER: I'll rephrase

10   it.

11   Q.   After you realized that that wasn't his

12   e-mail address, what did you do next?

13   A.   I believe I wrote a separate e-mail to

14   ████. Actually, forwarded it, I think, and

15   used his Medidata e-mail address. Sent it to

16   him. And didn't approve until I had a chance

17   to speak with him and he confirmed that it

18   wasn't his e-mail.

19   Q.   Did you go into the Chase system and

20   cancel the wire once you e-mailed with

21   ██████████?

22   A.   No. I never entered the Chase system, I

23   don't believe.

24   Q.   And that wire transfer, the one that's

25   in September, the second attempt on September

1   ███████

2   18th didn't go through, correct?

3   A.   Correct.

4   Q.   And it couldn't go through without your

5   approving it, correct?

6   A.   Correct. It required dual signature or

7   approval.

8   (E-mail sent to ███████████ by ██

9   ████ was marked as Defendant's Exhibit 9 for

10   identification, as of this date.)

11   Q.   Let me show you what I'm marking as

12   Exhibit 9. Is this the e-mail that you sent to

13   ████████████ after the second request for a

14   wire transfer?

15   A.   Yes.

16   Q.   Did you, after sending this e-mail to

17   ███████████, have a conversation with him?

18   A.   Yes.

19   Q.   Did he contact you or did you contact

20   him?

21   A.   I contacted him.

22   Q.   Do you recall anything that was said

23   during that conversation?

24   A.   Yes. Him being absolutely surprised.

25   Q.   Do you remember anything else he said

1   █████████

2   during the conversation?

3   A.   No, because I think everything just kind

4   of went dark afterwards.

5   Q.   What do you mean by that?

6   A.   Meaning when I realized that the first

7   one was not authentic request, realizing what

8   had actually occurred, everything just kind of

9   went dark.

10   Q.   Did you have anything -- strike that.

11   Were you asked to do anything in

12   connection with the first wire transfer after

13   you had this conversation with █████████   on

14   September 18th?

15   A.   I believe we went into retraction mode.

16   Meaning we started to get in touch with Chase

17   and do whatever we could to see if the money

18   could be retrieved back from where it went out.

19   Q.   Was any of that successful?

20   A.   No.

21   MR. SCHMOOKLER: Let's just take

22   a few minutes. I'm waiting for a

23   document.

24   THE VIDEOGRAPHER: Going off

25   record at 11:08 a.m.

1   ███████

2   (Severance and separation agreement for

3   ████████ was marked as Defendant's Exhibit 10

4   for identification, as of this date.)

5   THE VIDEOGRAPHER: We're back on

6   the record at 11:14 a.m. You may

7   proceed.

8   BY MR. SCHMOOKLER:

9   Q.   ████████, you said, and I just want to

10   follow up on a couple things you said. You

11   said that before you approved the wire on

12   September 16th, you spoke to ██████████ and

13   asked her if she spoke to him. Why did you do

14   that?

15   A.   Because I wanted to validate the

16   validity of the wire, and making sure, given

17   the lack of documents, that there was some

18   authentication of the request coming from the

19   ████████.

20   Q.   And so in your mind, ████████'

21   statement that she spoke to him was your

22   validation of the validity of the wire?

23   A.   Yes.

24   Q.   And did you rely on that validation in

25   approving the wire transfer?

1   ▮▮▮▮▮

2   A.   That along with the content of the

3   e-mail, yes.

4   Q.   Were you ever involved in any sort of

5   approval of an expenditure where you didn't

6   validate the expenditure before you approved it

7   while you were at Medidata?

8   MR. ZIFFER: Objection.

9   A.   I don't recall, but no.

10   Q.   So at least from your own process

11   perspective, validating the expenditure was

12   something you always did before you would

13   approve a transaction, correct?

14   A.   Yes.

15   Q.   And as far as part of your own process,

16   you wouldn't approve a transaction without some

17   validation, correct?

18   A.   Correct.

19   Q.   And that, when you contacted

20   ▮▮▮▮▮▮▮▮ about the second attempt, was that

21   your attempt to validate the second attempted

22   wire transfer?

23   A.   Yes.

24   Q.   And so at least -- and it was that

25   attempt at validation which ultimately led you

66:15
believed 61:3,6
beneficiaries
56:2
beneficiary 55:3
BENSON 2:3
best 5:24 40:9,18
43:25
BlackBerry 53:5
blood 73:17
Board 27:10
boss 30:10
bottom 23:8
28:14 40:18
43:9 50:19
62:20
break 7:16,19
34:16,17
Broadway 2:4
budgeting 11:8
business 34:8
69:23
button 16:16
17:2 41:3,7,13
41:17,20,25
42:4,8,12,20
42:25

_____

C

C 2:1 5:2 73:1,1
call 45:2,5 58:7
called 10:18
16:21 45:4
calling 52:8
calls 62:19
cancel 64:20
carry 53:19
case 5:17 45:20
74:3
cash 24:15 27:20
27:25 72:12
catch 16:21
CEO 26:16,24
certain 18:11,14
27:5 41:23,24
42:3 48:24
59:14

certainty 49:10
certification 3:6
certify 73:6,16
CFO 9:12,13,17
9:24 13:12
26:15,18 31:13
49:9
chance 36:6
64:16
CHANGE 74:6
charge 3:18
Chase 12:7
14:24 15:3,6
15:10,12,17,22
16:15 17:7,9
19:13 32:20
39:3,11 50:21
54:20 57:13,19
57:20,21 58:2
58:6,8,15,23
64:19,22 66:16
check 29:6,9
checks 12:3
Chicago 2:11
Chief 11:16
███ 1:15 4:10
5:1,12 6:1 7:1
8:1 9:1 10:1
11:1 12:1 13:1
14:1 15:1 16:1
17:1 18:1 19:1
20:1 21:1 22:1
23:1 24:1 25:1
26:1 27:1 28:1
29:1 30:1 31:1
32:1 33:1 34:1
35:1 36:1 37:1
38:1 39:1 40:1
41:1 42:1 43:1
44:1 45:1 46:1
47:1 48:1 49:1
50:1 51:1 52:1
53:1 54:1 55:1
56:1 57:1,8
58:1 59:1 60:1
61:1 62:1 63:1
64:1 65:1,9

66:1 67:1,3,9
68:1 69:1 70:1
71:1,10 72:4
72:24 73:7
74:5,20
circumstances
24:12
Civil 1:6
clarify 18:4
classified 30:19
clear 21:21
click 41:20,25
42:4,8
clicked 42:19
clinical 69:25
college 7:25
come 6:21 14:15
14:17 18:5
comes 7:8
comfortable
16:11
coming 35:23
67:18
commencement
73:11
comment 23:11
COMMISSION
74:25
company 1:8
4:12 10:18
12:14 13:3
18:21 20:15
29:12,18 37:16
37:25 40:2
69:10,20 70:13
company's 21:5
compare 19:16
19:19,20
complete 23:25
computer 15:17
33:7 53:10,17
concept 10:14
conclude 45:23
46:10
conclusion 46:15
conference
53:25

confirm 45:12
confirmation
48:13
confirmed 64:17
connection 27:9
61:3 66:12
70:12
consistent 55:18
55:24
contact 65:19,19
contacted 65:21
68:19
content 68:2
Continued 70:16
continuing 8:25
controller 12:22
13:12,13 14:16
21:15,18
conversation 6:5
26:9 60:18,23
61:9 63:20
65:17,23 66:2
66:13
copies 13:16
copy 3:17 40:9
Corporate 23:15
23:16
correct 15:8
17:22 18:11
19:10 34:10
35:15 38:23
39:3,8,14,20
41:18 45:16
46:17,23 47:20
48:2,5,19,20
53:2 55:4,8,13
56:24 63:7
65:2,3,5,6
68:13,17,18
69:3
correctly 30:25
36:14
Cory 11:18
26:20
counsel 4:15
country 37:19
couple 21:11

57:3 67:10
course 52:17,19
court 1:1 3:17
4:13,22 5:21
5:21,23 6:4,8
7:5,8,13
courtesy 6:3
CPA 8:18,20,22
CRCC 4:6,23
current 9:7
currently 47:5
C-H-I-N 5:13

_____

D

D 72:1
dark 66:4,9
date 4:4 22:20
27:22 40:6
43:5 54:7
56:11 61:15
62:5 65:10
67:4 74:4
dated 40:4
Dave 63:15,15
day 34:15 35:11
42:18 44:6
52:20 71:13
73:21 74:23
days 45:8
day-to-day 33:4
███ 21:25 22:10
27:16 38:13,22
39:2,7,13
40:24 44:14
45:17 48:16
50:2,17 51:3,6
51:23 52:6,13
53:9,23 59:3
64:21 65:8,13
65:17 66:13
68:20 72:22
Defendant 1:9
1:15 2:10 4:19
Defendant's
22:19 27:21
40:5 43:4 54:6
56:10 61:14

62:4 65:9 67:3
72:8
definitely 46:23
degree 7:24,25
8:3,4,6,8,12,16
department 9:15
9:19 48:23
49:7
deposed 5:14
deposition 1:14
3:13 4:7 5:16
6:22 74:4
describe 7:11,12
7:22
described 32:23
designated 25:9
designee's 24:19
desk 63:4
detect 44:4 45:3
determine 34:3
determined 32:6
determining
38:18
difference 44:3
different 17:25
29:12,17,25
33:24 62:8
digital 58:18,22
Director 27:11
Disc 4:10
discounted 31:7
discovery 27:25
discuss 25:6,14
discussions
35:20
disrupt 24:14
District 1:1,2
4:13,14 5:18
doc 18:25
document 16:10
16:12 18:20
19:2 22:17,21
22:24 23:2,22
23:23 24:6
27:20,24 28:5
28:9 51:20
56:15 57:5

66:23 70:5
documentation
19:18,24,25
20:2 36:19,22
documented
28:18
documents
14:18,20 16:7
19:8,9 67:17
doing 39:18
dollar 18:14
22:11 27:17
dollars 37:2
dongle 16:2,22
17:2
dots 40:19 41:6
41:8,16
Douglas 11:18
26:20
dual 65:6
duly 5:3 73:10
duplicate 56:22
Dydacomp
10:18
D-Y-D-A-C-O...
10:19

_____
E
e 2:1,1,16,16
53:2 72:1,6
73:1,1 74:1,1,1
earlier 31:19
32:19,23 36:17
38:17
early 8:21 9:5
easier 5:23 6:3
6:11 43:12
eastern 60:6
education 9:2
educational 7:22
effect 3:16
effectively 24:15
embarrass 6:16
emergency 23:8
24:8,13,13,16
24:17 25:11,15
25:18,21,22,24

26:5
employed 9:9
employee 29:12
employees 9:25
29:18 30:2
employer 9:7
encouraged
24:16
engineering
10:15
enter 14:23
15:13 16:3,16
16:20 17:8,25
entered 15:16
64:22
entering 58:22
entitled 6:23
22:17,22 27:20
27:25
Entrepreneurial
8:9
entry 29:10,16
29:23
escapes 12:24
ESQ 2:5,12
essentially 69:25
established 16:6
■■■■■■ 20:4,15
20:22 21:4
30:4 36:2,5
49:13,16 50:24
51:5,22 52:2
67:12,20
evidence 16:13
EVP 69:22
exactly 39:18
examination
3:17 5:8 72:3
examined 5:5
excuse 28:9,11
execute 13:20
exhibit 22:16,19
23:12 24:5
26:10 27:22,24
27:24 40:5,8
43:4,7,17,21
43:22,24 44:4

44:5,5,11,11
44:14 45:16,22
47:2 49:15
50:20 53:14
54:6,9,23
56:11,13,23,25
61:14,17 62:4
62:7,12,13,15
62:20 65:9,12
67:3 70:5,8
EXHIBITS 72:8
existing 37:25
39:25 55:16,24
56:6
exit 69:21
expenditure
68:5,6,11
expenditures
12:15 13:4
EXPIRES 74:25
explain 69:9,12
69:16
explanation
15:25 36:8,12
extend 6:2
extent 24:5
31:17
e-mail 10:2
21:23 30:15,18
30:23,24,25
31:3,3,10,24
32:6,14 33:2,5
33:13 34:8,8
35:19,21 36:3
38:5,6,7,13,21
38:25 39:6,12
40:4,12,16,24
41:12,17,21
42:19,24 43:3
43:8,14,16,20
44:4,10,17,20
45:10,14,16,21
46:8,23 47:2
47:15,16,16,25
48:5,16 49:16
50:2,10,16,20
51:2,6 52:18

53:9,12,14,23
59:3,13 62:22
63:23 64:3,5
64:12,13,15,18
65:8,12,16
68:3 72:14,15
72:22
e-mailed 64:20
e-mails 43:7
52:9 53:3

_____
F
F 73:1
fab 17:2
fact 27:16 40:25
47:23
failed 48:4,8,17
fair 6:11,19
27:13 49:24
familiar 10:14
59:21
far 22:6 32:12
56:2 68:15
fashion 6:10
Federal 1:8 4:12
74:3
figure 59:11
filing 3:5
finance 8:9 13:5
13:6,8,10,14
23:15 24:18,23
finance's 24:14
financial 11:4,14
11:16 28:19
47:5
find 16:5
finish 5:25 23:25
first 5:3 12:8
13:15 19:6
31:18,21,23,24
32:25 35:17
43:17 46:2
47:4 50:6,20
51:2 52:25
53:22 58:9
59:2 66:6,12
floor 22:8 60:11

flow 24:14
fob 17:3,8,11,17
　19:14 38:23
　39:2 54:22
　57:23
fobs 17:24
follow 67:10
followed 38:17
following 23:14
follows 5:5
force 3:15
forget 63:20
form 3:9 18:21
　28:18,23
formal 10:7
forwarded 64:14
frame 13:20
Franklin 2:10
FRIEDMAN 2:3
front 23:18
fund 37:25
　39:25 47:11
funding 56:6
furnished 3:18
further 3:8,12
　71:3 73:16

G

gain 15:14 16:4
　16:25
generally 25:23
　25:25
generate 17:17
generated 19:14
　54:21 57:23
gesturing 7:10
　7:11,12
getting 45:7
　51:18
given 13:16
　48:11 67:16
glean 57:4
█████ 20:18
　21:24 26:23
　36:16 44:14
　45:10,17 48:14
　51:3,17 53:23

64:3,14 65:8
72:22
████ 62:22
Gmail 33:9,11
　33:15,19,22
　42:9,14 52:25
Gmail.com
　34:12
go 6:10 15:7
　20:19 33:9,12
　34:9,15 36:20
　39:20 46:25
　47:18,24 48:18
　64:19 65:2,4
God 8:21 12:24
　31:2
going 5:18,19
　6:13 22:16
　31:14,22 34:7
　34:14,22 37:10
　39:25 40:2,7
　44:11 56:7
　66:24 71:5
Google's 33:12
Gordon 1:16 2:9
　4:8
graduate 7:24
　8:2,4
great 34:21
group 13:5,7,8
　13:10 30:4,8
　34:5
groups 29:12,17
　29:25
guess 23:19 24:4
　49:12

H

H 5:1,2,2 6:1 7:1
　8:1 9:1 10:1
　11:1 12:1 13:1
　14:1 15:1 16:1
　17:1 18:1 19:1
　20:1 21:1 22:1
　23:1 24:1 25:1
　26:1 27:1 28:1
　29:1 30:1 31:1

32:1 33:1 34:1
35:1 36:1 37:1
38:1 39:1 40:1
41:1 42:1 43:1
44:1 45:1 46:1
47:1 48:1 49:1
50:1 51:1 52:1
53:1 54:1 55:1
56:1 57:1,8
58:1 59:1 60:1
61:1 62:1 63:1
64:1 65:1 66:1
67:1 68:1 69:1
70:1 71:1 72:6
74:1
hand 73:21
happens 34:2
happy 6:15 7:17
harder 6:9
head 7:6
header 23:14
held 1:16 4:7
　73:8
help 59:22,23
hereunto 73:20
hint 49:17
hit 16:16,17
　45:13
███ 1:15 4:10
　5:12 57:8 65:8
　67:3 71:10
　72:4,24 73:7
　74:5,20
Hoolan 4:23
　73:4,25
hour 49:25
　50:10
human 69:22

I

ID 16:23 57:10
　57:15,16,24
　58:2,9,14,19
idea 37:2 56:3
identification
　22:19 27:22
　40:6 43:5 54:7

56:11 61:15
62:4 65:10
67:4 72:9
identify 4:16
illegitimate
　45:24 46:12,22
Illinois 2:11
immediately
　46:19 61:9
impression 56:5
improving 69:25
inactive 8:21 9:3
　9:4
incident 20:9
　30:24 31:19,21
including 13:22
individual 59:8
individuals
　17:13,15 48:24
　52:16 59:12
industry 70:2
informal 12:19
Informally
　12:18
information
　42:13 51:8
　54:22,24 55:17
　55:23
initial 45:8
initially 18:5
initiated 21:23
　28:17
input 58:9
instances 14:10
　21:11 42:7,11
instant 62:16,17
instructions
　50:25
insular 24:6
Insurance 1:8
　4:12 74:3
interactions
　14:17
interested 73:18
internally 9:21
　9:23
Internet 9:25

10:5 15:8,18
33:12 58:7
Internet-based
　15:4
interpose 6:23
interrupt 23:11
interval 23:22
interview 69:21
investments
　24:15
involved 32:10
　68:4
involvement
　21:22
iPhone 53:6,7
　62:19
i-Message 62:19
i-messaging
　61:13,25 62:3
　72:20,21

J

January 9:10
Jeanette 4:23
　73:4,25
job 5:23 6:9,10
joined 13:15
███ 59:13 62:21
████ 61:23
June 1:18 4:4
　73:21 74:4
jurat 70:17

K

KASOWITZ
　2:3
Kathy 2:17 4:6
keep 24:16
　52:19
kept 17:11
key 16:3,16,17
　16:21 17:3,3
　32:20 57:23
kind 66:3,8
knew 32:24
　39:10 48:11
　55:21

know 6:15 20:4
20:13,22 21:3
21:3,16 22:9
25:13 26:7
27:15,19 32:12
32:17 33:18
34:2 36:15
37:18 41:9,11
41:12 42:3,7
42:11,15,16
44:5 49:6,8,9
49:13 50:9,18
50:24 51:4,16
52:13 61:2,7
61:19
knowledge
55:15
known 48:22

L

L 2:16 3:1 73:4
73:25
lack 67:17
laptop 53:18
54:3
large 45:11 62:7
leads 60:23
learned 35:17
leave 69:10,13
69:19
leaving 32:2
led 45:22 46:10
47:10 68:25
left 69:6
legitimate 14:6
16:8 46:20
48:25 49:4
61:4
let's 30:13 66:21
levels 27:4
LINE 74:6
literally 6:5 19:2
litigation 22:22
little 6:9 16:22
LLP 1:16 2:3,9
located 4:8
log 14:19 15:10

16:2 17:6
19:13 33:9,12
33:21 38:18
39:3 58:6,7
logged 15:12
33:23 39:11,17
54:20 55:2,7
55:11,22 57:13
long 9:9
look 16:7
looked 31:7
looking 15:21
46:18
looks 61:17
lot 13:23 52:15

M

M 37:10,12
mails 53:2
making 67:16
manage 24:15
management
8:10 11:12
manager 20:8
63:19 69:21
mark 22:16 29:9
marked 22:18
27:21,23 40:5
40:7 43:4,6
54:6,8 56:10
56:13 61:14,16
62:3,6 65:9
67:3 70:4
marking 65:11
marks 29:6
marriage 73:18
Match 16:8
matches 16:10
matter 4:11
52:17 73:19
MBA 8:9
mean 13:6 21:8
33:11 35:22
66:5
meaning 21:21
37:14 46:9
51:17 66:6,16

mechanical
12:12
MED 23:3
Medidata 1:4
4:11 10:21,23
10:25 11:3,19
11:24 12:5,8
13:15 22:25
24:24 25:9
26:13,18,21,24
27:4 28:6,22
30:6,16 31:10
32:2,13,22,25
33:6,23 37:16
44:17 46:16
47:13 49:4
50:25 56:6
57:11,14 58:3
61:5 64:15
68:7 69:5,23
74:3
Medidata's
11:25 12:9
32:22 55:16
meet 21:25
meeting 53:25
59:2,4,7
meetings 50:14
mention 36:2
59:6
mentioned 16:20
18:18
message 62:2
messages 62:8
messaging 62:16
62:17
Metidata's
11:20
mid-2000 9:6
million 22:11
26:16 27:17
37:2 49:21
mind 20:17
31:16 67:20
Mine's 62:15
minimize 17:4
minimum 24:17

minute 49:20
minutes 34:15
34:18 66:22
mode 66:15
moment 37:21
38:6
money 31:25
36:8,12 39:20
45:9 47:17,20
48:18 66:17
Monthly 23:6
morning 52:18
52:22

N

N 2:1,16 3:1 5:2
72:1
name 5:10,11,12
5:12 12:24,25
33:24 40:25
41:14,21,23
42:4,8,9,12,20
42:24 43:24
57:5 58:18
74:3,5
nature 7:7 40:13
54:24
navigate 59:22
59:23
navigating 60:12
near 60:10
necessary 31:6
31:15
need 7:9 17:7,24
18:15 40:21
47:6
needed 16:24
58:14 59:22
never 14:25 24:4
27:14 31:16
64:22
new 1:2,17,17,19
2:4,4 4:9,9,14
5:4,18 17:3
63:19 73:5
newest 43:8
nice 62:7

Nods 7:6
Non-Party 1:14
normal 6:5
North 2:10
Notary 1:18 5:3
71:15 73:4
74:25
Noted 71:7
notes 73:15
Notice 1:16
number 47:19
numbers 11:11
16:8

O

O 2:16 3:1 5:2
oath 3:15
object 24:5
objection 6:23
18:3,22 20:24
21:7,20 22:12
25:12,20 26:6
27:18 30:17
31:12 32:3,8
32:16 33:17
38:3 40:17
42:21 44:8
47:22 56:8
64:8 68:8
70:14
objections 3:9
obtain 38:23
obviously 22:13
27:7
occur 44:25
occurred 30:21
44:24 66:8
69:15
occurring 37:19
offer 34:17
office 4:7 22:3,6
22:6 52:14
60:10
officer 3:14
11:16
offices 1:16
Oh 28:12

okay 6:6 7:3,14
  7:20 18:8
  20:20 28:12
  40:11 43:15
  44:13 46:24
  53:21 56:15
oldest 43:9
once 16:11 38:16
  64:20
one's 62:7
one-page 56:15
ongoing 61:4
open 52:19
operation 47:5
operator 4:5
order 15:6 17:6
  17:23 19:13,22
  39:13 41:13
  52:25
orderly 6:10
organization
  37:15 69:6
organizations
  70:3
outcome 73:19
outlined 38:17
outside 9:22
oversee 9:14

       P

P 2:1,1,16 3:1
page 23:13,18,19
  26:10 28:8,9
  28:12,25 43:17
  43:18,21 46:25
  49:15 50:20
  70:16 72:3,9
  74:6
paper 7:10,12
  51:20
paperwork
  36:19
Park 1:17 4:9
part 68:15
particular 35:22
  53:12
parties 3:5 56:3

  73:17
Partly 59:21
Paschal 2:17 4:6
pass 8:20
passed 49:25
password 15:13
  15:16 16:3,19
  16:23 17:4,8
  17:17 19:14
  33:8,24 38:23
  54:21 57:23
  58:10,14
passwords 17:25
pay 32:9
payable 22:17
  22:23 23:6
  25:21 28:17
  30:9 72:10
payables 20:8
payment 23:6
  24:17 25:6
  47:7,11
payments 23:9
  24:8,13,13,18
  25:11,15,19,22
  25:22,25 26:5
pending 5:17
  7:18 47:12,12
Penn 8:13
Pennsylvania
  8:5
people 9:19,22
  17:20 18:10
  35:14
person 19:9
personal 33:19
  33:21 34:8
perspective
  33:25 34:6
  68:11
pertained 38:19
pharmaceutical
  70:2
phone 53:9,16
  54:3 61:21,22
  62:14
physically 17:11

  22:7
place 73:9
plaintiff 1:5 2:3
  4:21
planning 11:4
  11:14
play 37:7
Plaza 1:17 4:9
please 4:15,24
  6:15 29:21
plus 22:11 27:17
  37:2
point 10:25
  35:13
policies 12:9
  13:16 21:5
  22:18,23 72:10
Policy 23:16
  27:21 28:2
  72:12
populate 41:14
populated 42:13
position 9:11
  11:3,7 20:6
positive 48:13
possession 17:12
potentially 31:4
  31:6,15
practice 8:23
practiced 8:22
preceding 23:20
prepare 19:19
  █████ 26:15
  26:21 67:19
pretty 15:24
prevent 29:4
printout 54:5,10
  54:10 72:17
prior 10:17 14:5
  20:9 21:10
  25:5 30:13,14
  30:14 31:8
  35:20 36:3
private 8:23
probably 45:7
procedure 27:21
  28:2 38:17

  72:13
procedures
  12:10 13:17
  15:25 21:5
  22:18,23 23:17
  72:11
proceed 5:7 35:3
  67:7
process 18:9,10
  19:6 32:18,23
  37:14 47:6
  68:10,15 70:2
processed 29:3
Procurement
  23:16
produced 23:23
  23:24
program 15:17
prompt 32:14
  47:17
prompted 15:18
provide 9:18,21
  17:3 41:3 51:8
  54:22 57:14,24
provided 9:24
  12:9,13 16:3
  16:23 19:18
  22:22,24 26:12
  27:25 28:5
  29:15,22 30:3
  34:4 36:8,11
  36:21 42:9
  57:17 70:11
provides 69:24
Providing 11:11
Public 1:18 5:4
  71:15 73:5
  74:25
publicly 33:15
  33:16
published 58:3
purchase 37:18
  37:25 40:2
  47:12 48:21,22
  49:2,4,13
  55:16,25 56:6
  61:4,8

purchases 27:6
purchasing
  37:16
purport 23:25
purports 24:6
purposes 6:24
  46:5
pursuant 1:15
push 16:25 41:2
  41:13 42:12
put 15:2 16:18
  33:8 61:12
putting 14:8
p.m 45:16 47:2
  47:16 49:16
  53:13

       Q

quality 40:8
question 3:10
  5:25 6:7,17,18
  6:25 7:2,18,19
  11:22 18:24
  20:9,19,21
  21:2,17,23
  24:7 26:2
  29:20 35:9
  38:10 41:15
  42:10 46:8
  54:14
questioned
  63:10,13
questions 5:19
  6:14,15 24:3
  71:4

       R

R 2:1,16 73:1
  74:1,1
random 17:8
reach 46:15
read 10:8,9,12
  24:10 29:19
  38:11 53:8,15
  53:22
reads 23:15
ready 31:4,14

realized 31:16
  45:13 63:22
  64:4,11 66:6
realizing 66:7
really 32:9 45:12
reason 56:4 74:6
reasonableness
  14:21
recall 9:4 10:7,9
  10:11 12:4,25
  13:2 14:7,25
  16:18 18:17
  20:12 21:12
  23:2 26:8
  28:24 30:21,22
  30:24,25 35:5
  35:10,10,17
  36:4,7,14
  37:20 40:12,23
  41:2 42:16,18
  42:22,23 43:2
  44:9 49:8,9
  52:15 53:11,18
  53:21 58:25
  59:8,19 61:11
  61:25 62:12
  63:12 65:22
  68:9 69:18
receipt 35:21
receive 8:2,6,11
  12:17,19 27:8
  53:2
received 8:4
  10:5 31:10
  36:18 38:5,7
  38:12,21,25
  39:6 40:23
  42:23 45:9
  47:15,24 48:5
  48:16 50:2,10
  50:16 51:2,6
  52:10 59:2
  63:9 69:8
receiving 36:3
  39:12 40:12
recess 34:24
recognized 48:8

record 4:3 5:11
  6:24 24:11
  34:23 35:2
  38:11 66:25
  67:6 71:6
recorded 5:20
Rees 1:16 2:9
  4:8
reference 43:14
referenced
  48:21
referring 11:10
  19:25 37:13
  51:16,17
reflect 27:10
regard 60:18
regarding 52:10
regards 40:19
  43:25
regular 13:19
related 46:16
  73:16
relates 63:6
relating 31:10
released 57:6
rely 67:24
remember 12:5
  36:5 53:8
  58:22 59:3,16
  60:17 63:17
  65:25 69:19
repeat 11:22
  26:2 29:20
rephrase 6:16
  38:12 64:9
reply 44:14
  45:13
report 11:13
reported 30:11
reporter 4:23
  5:21,21 6:4 7:5
  7:8,13
reporter's 5:23
  6:9
represent 4:17
  41:17
representing

  3:19
request 7:17
  20:16,17,18,23
  21:5,8,18
  22:10 28:18,23
  48:12 50:15
  65:13 66:7
  67:18
requested 38:11
requests 24:17
require 24:12,18
required 65:6
reserved 3:10
resign 69:5
resources 69:22
respective 3:4
respond 64:3
responded 52:2
response 21:14
  51:13
responsibilities
  11:6 29:10
responsibility
  9:14,18
result 31:21,25
retraction 66:15
retrieved 66:18
reused 17:4
review 14:18
  19:9
Revtrax 9:8,11
  9:13,17,24
  10:17,23
right 60:6 62:15
  63:23
right-hand 62:2
rip 56:16
Rob 13:13 24:25
  30:11
room 63:16
rooms 53:25
routing 54:23
R-E-V-T-R-A-X
  9:8

──────────
          S
──────────
S 2:1,5,16,16 3:1

  3:1 72:6 74:1,6
safeguards 34:4
Samsung 53:6
saw 44:6 56:21
  62:21
saying 31:16
  35:23
says 23:5,8,19
  23:21 24:7
  26:11,15 28:16
  29:2,9 40:18
  44:14 45:17
  47:4 49:21
  50:20 57:6
  58:17
scams 10:2,2,6
  30:15
scenes 34:2
Schedule 23:6
Schmookler
  2:12 4:18,19
  5:9 22:15
  25:24 34:14
  35:4 56:12,18
  56:20 64:9
  66:21 67:8
  71:2 72:4
  ▇▇▇▇▇ 59:9
  59:17,20 60:9
  60:19 61:2
  62:25 63:3
Scott 2:12 4:18
screen 54:5,12
  54:17 56:10,23
  61:13,17,18,20
  61:22 62:3,8
  62:13 72:17,19
  72:20,21
sealing 3:5
second 18:6,13
  29:9,19 44:24
  44:25 45:21,23
  48:12,15 50:7
  50:8 58:10
  63:6,13 64:25
  65:13 68:20,21
section 28:13,14

secureop@dr....
  44:15 45:17
  46:9,15
see 23:5 24:7,21
  26:11,15 28:2
  28:13,20,23
  29:7,13 40:15
  40:21 43:10,16
  43:20,24 44:10
  45:15 47:8
  49:15,18,22
  50:19 55:3,6
  55:12 57:5
  58:17 62:10
  66:17
seeing 23:2
seen 24:4 27:14
  44:20,23 54:9
  54:10,15 55:5
  56:25 70:5
segregated
  29:11
segregation
  29:16,23
send 9:22
sending 65:16
sent 31:16 32:7
  64:15 65:8,12
  72:22
sentence 47:4
separate 64:13
separating 46:5
separation 67:2
  70:9 72:23
September
  30:14,15 31:9
  35:6,18 36:22
  37:23,23 40:4
  40:13 42:18,24
  43:3,13 44:7
  46:11 52:14,17
  54:18 64:25,25
  66:14 67:12
  72:14,15
sequence 36:4
sequential 23:12
series 5:19 6:13

services 24:19
    24:24 29:4
    30:12
set 43:7 50:15,21
    57:16 73:20
severance 67:2
    69:8 70:9
    72:23
share 52:9
shared 24:19,24
    30:12
Shaw 13:13
    24:25 25:3,6,9
    25:14,17 26:3
    30:11
shot 54:5,12,17
    56:10,23 61:13
    61:17,18,20,22
    62:3,9,13
    72:17,19,20,21
shoulders 7:7
show 22:15
    27:23 40:7
    43:6 54:8
    56:12 61:16
    62:6 65:11
    70:4
shrugs 7:6
sic 17:2
side 61:12 62:2
sign 12:3 16:12
    18:10,18,20,25
    19:23 34:7
    52:18,25
signatory 11:20
    11:24
signature 40:15
    41:4,9 58:18
    58:22 65:6
signatures 18:15
signed 3:13,16
    12:4 63:4
signing 32:19
sign-in 58:13
similar 43:21
sir 28:3 40:21
    43:10 70:6

sit 60:9,10
sitting 53:22
size 37:11
social 10:15
software 69:24
solution 69:24
Solutions 1:4
    4:11
somebody 32:5
    45:2
someone's 45:4
    45:5
sorry 19:20
    23:10 38:10
    40:22
sort 8:25 18:20
    45:15 53:5
    57:10,14 58:13
    58:21 60:21
    62:17 68:4
Southern 1:2
    4:13 5:17
spam 30:18,19
    30:23,24 31:6
    31:24 32:6
speak 52:7 59:9
    63:14 64:17
speaking 4:5
    45:19 53:12
specific 38:19
specifically
    45:19 51:12,23
    53:24
specifics 14:7
    37:20
spell 5:10
spelled 5:13
spoke 36:17
    51:13,15,22,23
    52:2,5 59:16
    59:19 60:12
    67:12,13,21
spoken 59:12
stamp 23:13,18
    43:14,17
stamps 60:5
stand 34:18

standing 53:22
start 6:2 23:25
    30:13
started 32:25
    63:21 64:2
    66:16
starts 62:21
state 1:19 4:16
    5:4,10 8:13
    73:5
stated 52:7
statement 67:21
States 1:1 4:13
static 16:24
stenographic
    73:15
stenographica...
    73:12
step 19:6,12,16
    38:7,14 39:5
steps 12:12 19:5
    47:19
Steven 12:24
    14:16
STIPULATED
    3:3,8,12
stolen 17:5
stop 64:6
stopped 59:15
Street 2:10
strike 17:13
    31:19 38:4
    39:10,23 52:23
    58:12 66:10
    69:9
string 43:3,8
    72:15
strongly 24:16
Subscribed
    71:12 74:22
subsequent
    46:11 47:23
successful 66:19
Suite 2:11
sum 45:11
support 11:11
    36:22

supporting
    14:18,20 16:7
    18:25 19:8
    20:2 36:19,21
sure 5:12 6:12
    7:24 11:23
    16:7,9 19:4
    20:25 21:3,8
    21:10 26:3
    29:22 41:16
    42:11 46:24
    60:25 61:18
    62:21 67:16
surprised 65:24
suspicious 45:12
SVP 69:22
swear 4:24
sworn 3:14,16
    5:3 71:12
    73:10 74:22
system 14:24
    15:3,4,7,14,22
    16:4,15,25
    17:7,9 19:13
    19:17 32:13,20
    38:18 39:3,12
    39:17 41:12,18
    41:21 54:20
    55:8,11 57:13
    57:18,19,20,21
    58:2,6,8,13,15
    58:23 59:22,23
    60:13 62:17
    64:19,22
systems 33:13

———————————
            T
———————————
T 2:16 3:1,1 72:6
    73:1,1 74:1,1
Table 26:11,12
    27:14
take 5:16 6:4 7:5
    7:8,13,16,19
    8:25 16:6
    34:16 66:21
taken 1:15 34:24
    73:12

takes 5:21
talk 5:24 14:9
    25:2 60:13
    61:8 63:21
talking 25:21
    31:24 37:9
    45:18 48:25
Tarek 27:2
team 11:12
tell 25:17 46:19
    46:21 51:11
terminated 69:7
termination
    70:12
terms 12:10
    23:13 54:23
testified 5:5
testifying 3:19
testimony 7:14
    31:25 73:7,11
    73:12
text 43:21,22
    61:18 62:20,24
    63:10
texting 62:18,19
texts 63:3
Thank 56:20
thing 56:21
things 7:7 54:24
    57:3 58:9
    67:10
think 31:2 43:12
    57:4 61:2
    63:20 64:2,14
    66:3 69:22
third 19:16 39:5
thought 22:13
    45:25
three 13:22,24
    41:6,8,16
threshold 18:14
time 3:10 4:3
    6:21 7:17 10:4
    13:20 16:24
    20:13,21 21:16
    22:9 24:10,10
    25:8 27:14

36:7,25 37:11
37:22 38:4,16
39:10,11,16
43:13,16 44:24
44:25 49:5,25
50:3,16 51:2,5
51:7 53:19,22
54:2 55:2,7,10
55:22 59:14
60:2,5,6 63:9
63:12 64:4
71:7 73:8
times 41:22,23
41:24 42:3
title 20:7 23:17
today 5:16 6:9
14:9 20:14
25:3 27:10
46:6
Today's 4:4,22
told 6:25 13:2
14:4 25:8 26:3
31:5
top 23:5,15
26:12 43:8,18
43:20 44:4
46:25 53:14
TORRES 2:3
totality 18:9,9
touch 66:16
training 9:18,21
9:22,25 10:5,5
10:7 12:9,13
12:17,20 29:15
29:23 30:3
transaction 14:6
14:8 21:22
27:11 29:10
35:7,8,23
37:11,12 38:20
45:8 49:7
55:19,22 60:21
64:6 68:13,16
69:14
transactions
14:12,13 29:5
transcript 73:14

transfer 14:5,14
15:7,23 17:23
18:21 19:5,17
19:23 20:11,13
20:16,21 21:13
21:16,19 22:9
22:11 25:2,6
27:9,15,17
28:18,23 29:24
29:25 31:9,11
31:22 32:7,15
32:21 35:5,18
37:23,24 38:8
38:15 39:8,14
39:18,19,22,24
44:7 47:11,19
48:2,10,18
49:6 50:4,7,15
50:25 51:7,9
52:11 54:6,18
55:17,24 57:22
58:8,23 59:6
59:10 60:14
61:3,10 63:10
63:13 64:24
65:14 66:12
67:25 68:22
69:2 72:18
transferred 37:3
45:9
transfers 12:11
13:21 14:10
15:19 17:16,19
18:11,12,19
20:23 21:6
28:13,16 29:2
29:17 35:14
36:18
trial 3:11 69:25
true 73:14
try 7:11 34:17
64:3
trying 31:2
59:11
turn 23:3 28:8
28:25 33:7
two 5:20 17:20

17:25 18:10,15
18:15 29:6,11
29:17,25 49:11
58:9
typed 40:25

U

U 3:1
uh-huh 7:7
40:20
uh-uh 7:7
ultimately 68:25
unauthorized
29:5
unavoidable
24:12
unclear 23:21
undergoing 47:5
49:5
undergraduate
8:12
understand 6:14
17:6 18:23
19:4 20:25
31:8 46:14
48:7
understanding
17:22 27:3
31:18,20 39:23
55:18,23
understood 6:18
7:2 39:16
unforeseen
24:11
unique 16:3,21
16:23 19:14
32:19 54:21
57:23
United 1:1 4:13
University 8:5
8:13
use 29:3 43:13
51:24
user 34:6 57:10
57:15,16,24
58:2,9,14,19
user's 33:25

usually 34:17

V

v 28:14 74:3
valid 51:20
validate 48:12
67:15 68:6,21
validating 68:11
validation 51:19
67:22,24 68:17
68:25
validity 67:16,22
verbal 7:5 35:20
verbalize 7:9
verbally 51:8
verbatim 5:22
verify 14:6,12
versus 4:12
53:10
▓▓▓▓▓▓▓
11:4,14,19,23
24:18,23 30:12
video 4:5 5:20
7:8
VIDEOGRAP...
2:17 4:2,22 5:6
34:22,25 66:24
67:5 71:5
videotaped 1:14
4:6
voice 4:15
VP 13:14
▓▓▓ 21:25
22:10 27:16
38:13,22 39:2
39:7,13 40:24
44:15 45:17
48:16 50:2,17
51:3,6,23 52:6
52:13 53:23
59:3 64:21
65:8,13,17
66:13 68:20
72:22
▓▓▓ 53:9

W

waiting 66:22
waived 3:7
walk 14:11 15:3
15:21,24
walked 32:18
walking 18:8
want 19:4 21:3
23:11 24:3
34:18 51:15
56:16,19 61:2
67:9
wanted 16:24
45:12 46:24
48:12 56:14
67:15
wanting 48:13
wants 6:22
wasn't 23:24
31:6 32:10
59:21 64:11,18
watch 69:15
way 23:24 32:13
32:21,24 33:22
45:19 51:18
73:18
ways 5:20
website 15:10,13
34:9
web-based 29:4
weekend 31:5,14
went 10:21 19:6
35:6 66:4,9,15
66:18
we'll 38:6
we're 5:16 14:9
20:14 25:2
27:9 34:14,22
34:25 35:7,8
67:5
WHEREOF
73:20
wire 12:10 13:20
14:5,10,13,22
14:23 15:6,19
15:23 16:5,10
16:13,15 17:16
17:19,23 18:11

18:19,20 19:5	**work** 10:17,20	70:14 71:4	**22** 72:11	**7**
19:17,23 20:10	22:3 24:14		**24** 1:18	**7** 28:8 61:14,17
20:16,23 21:6	30:4,8 52:24	**1**	**24th** 4:4	62:12 72:20
21:13,19 22:11	**worked** 22:4,25	**1** 2:10 4:10	**25** 74:4	**727** 23:21
22:14 25:5	24:24 25:9	22:16,19 72:10	**27** 72:13	**730** 23:3,14
27:15,17 28:13	26:13,19,22,25	**1.5** 26:16	**29th** 73:21	**736** 28:10
28:16,18,23	27:4 28:6,22	**1:15-cv-00090...**		**737** 28:11
29:2,17,24,24	32:22 33:5	1:7	**3**	**764** 23:14,15,19
31:5,9,10,15	**working** 12:6	**10** 67:3 70:5,8	**3** 40:5,8 43:22	26:10
31:21 32:7,11	**world** 37:19	72:23	44:4,5,12	
32:15,21 35:5	**wouldn't** 68:16	**10:13** 34:23	72:14	**8**
35:14,18 36:6	**write** 49:17 64:3	**10:21** 35:2	**3:32** 43:17 47:2	**8** 23:20 62:4,7
36:15,18,23,25	**written** 19:7	**10004** 1:17	47:16 53:13,14	62:13,15,20
37:2,22,24	**wrote** 49:20	**10019** 2:4	53:23	72:21
38:8,14,19	64:13	**11:08** 66:25	**3:34** 45:16 46:9	**800** 2:11
39:7,14,19		**11:14** 67:6	**30** 60:11	
44:6 45:10	**X**	**11:19** 71:6,7		**9**
47:11,25 48:10	**x** 1:3,10 72:1,6	**12** 23:19,20	**4**	**9** 23:19,21,21
48:18 49:5,21		**13** 10:21	**4** 22:11 27:17	65:9,12 72:22
50:3,11,15,21	**Y**	**16** 30:14,15 31:9	37:2 43:4,7,18	**9:30** 1:18 4:3
50:25 51:7,9	**yards** 60:11	35:6,18 36:22	43:21,24 44:5	**90s** 8:21
51:19,21 52:10	**yeah** 34:13,20	37:23 40:4,13	44:11,14 45:16	**911** 57:8
54:5,13,17	49:10 56:18	43:3 44:7	45:22 47:2	
55:4,8,12,13	63:15	54:18 72:14,15	49:15 50:20	
55:17,24 56:5	**year** 8:14 9:10	**16th** 42:18,24	53:15 72:15	
57:22 58:8,23	14:2	43:13 52:14,22	**4.7** 49:21	
59:6,10,17,20	**years** 10:10	52:24 60:7	**4:26** 49:16	
60:3,13 61:10	**year-to-year** 9:2	67:12	**4:30** 60:6	
63:10 64:20,24	**York** 1:2,17,17	**1633** 2:4	**4:8** 50:20	
65:14 66:12	1:19 2:4,4 4:9	**18th** 65:2 66:14	**40** 72:14	
67:11,16,22,25	4:9,14 5:4,18	69:2	**43** 72:16	
68:22 69:2	73:5	**1986** 8:15	**45** 34:15,18	
72:18	**Yup** 7:4	**1997** 8:7		
wired 36:9,13			**5**	
wires 12:2 13:9	**Z**	**2**	**5** 54:6,9,23 72:4	
13:11	**Ziffer** 2:5 4:20	**2** 27:22,24,24	72:17	
wire-transferr...	4:20 18:3,22	72:12	**54** 72:18	
47:18	20:24 21:7,20	**2000** 9:5	**56** 72:19	
witness 1:15	22:12 23:10	**2010** 10:22		
3:19 4:21,24	25:12,20 26:6	**2013** 10:22 11:2	**6**	
5:2 34:20 72:3	27:18 30:17	**2014** 11:2 13:19	**6** 28:9,12 56:11	
73:10,20	31:12 32:3,8	14:2 35:6 40:4	56:13,23,25	
WITNESS'S	32:16 33:17	43:3 52:18	72:19	
74:5	38:3,9 40:17	72:14,16	**60606** 2:11	
wondering	42:21 44:8	**2015** 1:18 4:4	**61** 72:20	
53:15	47:22 54:14	71:13 73:21	**62** 72:21	
word 51:24	56:8,16,19	74:4,23	**65** 72:22	
	64:8 68:8		**67** 72:24	